

Exhibit J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JAMES RAYMOND MCCARTHY

I, James Raymond McCarthy, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was working for Oppenheimer Funds, Inc. and was present at 2 World Trade Center, 31st Floor, when the terrorist attacks of the World Trade Center Towers occurred.

4. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.



5. When the passenger plane struck the tower, I was working at the trade desk as a technology support specialist. I heard the plane before the collision and recall running to the window and seeing flames, then hearing an announcement over the loud speaker that everyone should stay in his or her seat. Instead, I immediately headed for the stairs to get down to the lobby. I walked down the stairs to the mezzanine level where I met up with some colleagues in shock, one of which was pregnant and hysterical. We all walked down the escalator to the main lobby. Security told us not to leave the building but we saw someone had kicked out a ground floor window. I saw them kick in the glass to escape and myself and the pregnant women followed them. Despite the instruction not to exit, we ran outside of the building, as we wanted to get away from the potential destruction within.

6. Upon leaving the building, I witnessed horrific scenes of people jumping from the towers to their deaths. Many body parts and heads scattered on the ground. Blood and debris everywhere. I kept running until I reached the Century 21 store near Brooks Brothers. I had only a moment of rest before I looked up, heard the second plane hit, and felt the heat from the collision. At that point, I was directly below the impact. The crowd around me started a stampede away from the tower down the only escape route available and was headed right towards us. I fell and was kicked in the head hundreds of times. I was kicked, piled on, and then someone picked me up by my belt and put me in a dumpster. I got out of the dumpster, headed toward South Street Seaport, and saw some of my other colleagues. The scene of the towers was horrific. I saw a Waterway Ferry Bus and headed toward it. The bus was redirected and obviously not on his regular route. I showed the driver my ticket and directed the driver to take me to the 38th street Ferry Seaport on the West Side Highway. He picked others up along the way and we eventually made our way to the ferry at 38th Street. I was able to get a ferry across the river to Weehawkin, NJ. When I arrived

on the Jersey side I was interviewed by a reporter from The Bergen Record and my statement was published the next day.

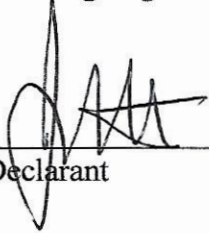
7. Because of these terrorist attacks, I suffered specific injuries on September 11, 2001, which included the following: back, brain, head and nerve injuries, and a herniated disc at the L5-S1 location, which causes chronic pain in my lower back region. My back injury also caused me to suffer from lumbosacral radiculopathies to the S1 and L4 nerves, sciatica, an antalgic gait, and numbness and tingling in my toes. I also experienced a severe concussion while being trampled in the stampede, which has also caused me to suffer from ongoing memory loss and dizziness. Lastly, I suffered an injury to my right finger during the events of 9-11, as well as stress-related heart disease and diabetes.

8. Due to these horrific terrorist attacks and the atrocities that I witnessed on 9-11, I also experienced and continue to experience significant PTSD, including panic attacks, nightmares, anxiety, and depression. My experiences on 9-11 have also caused me to struggle with alcohol dependency and substance abuse as a means of coping with my PTSD. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

9. I sought medical attention for my above physical and mental injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received because of the September 11, 2001 terrorist attacks.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 2nd day of January 2020.



Signature of Declarant

Exhibits Filed Under Seal